

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

**SHARON GORE, as Administratrix  
and Personal Representative of the  
Estate of TULLIS HERBERT GORE,  
Deceased,**

**Plaintiff,**

**v.**

**RONALD LARRY FOSTER, JOE  
DUBOSE TRUCKING, et al.,**

**Defendants.**

**CASE NO: 3:06-CV-167-WKW**

**NOTICE OF TAKING VIDEO DEPOSITION**

TO: Randall J. Haynes, Esq.

Please take notice that on the date and at the time and place indicated below, the defendants, **RONALD LARRY FOSTER and JOE DUBOSE TRUCKING**, will take the video deposition upon oral examination of the person named. The video deposition will be taken for purposes of discovery or for use as evidence in this action pursuant to the Federal Rules of Civil Procedure. The video deposition will be taken before a court reporter and/or some other officer authorized by law to administer oaths. The video deposition will continue from hour to hour and day to day until completed. You are invited to attend the video deposition and examine the witness as you see fit.

**DEPONENT: KEN BUCKLEY**

**DATE: Wednesday, September 20, 2006**

**TIME: 5:00 p.m.**

**PLACE:**                    **Hilton Garden Inn**  
                                     **2555 Hilton Garden Drive**  
                                     **(Airport Road Exit off of I-85)**  
                                     **Auburn, AL 36830**

/s/ David A. Lee  
David A. Lee (LEE019)  
ASB-3165-E47D  
Attorney for Defendant

OF COUNSEL:  
PARSONS, LEE & JULIANO, P.C.  
300 Protective Center  
2801 Highway 280 South  
P. O. Box 530630 (35253-0630)  
Birmingham, AL 35223-2480  
(205) 326-6600

CERTIFICATE OF SERVICE

I hereby certify that I have on this 18th day of September, 2006, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing same in the U.S. Mail properly addressed and first class postage prepaid to:

Randy Haynes, Esq.  
MORRIS, HAYNES & HORNSBY  
Post Office Box 1660  
Alexander City, AL 35011-1660

Richard E. Broughton, Esq.  
BALL, BALL, MATHEWS & NOVAK  
P. O. Box 2148  
Montgomery, AL 36102-2148

/s/ David A. Lee  
OF COUNSEL

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**NOTICE OF SERVICE OF DISCOVERY DOCUMENTS**

Come now the defendants, **RONALD LARRY FOSTER and JOE DUBOSE TRUCKING**, by and through their attorney, David A. Lee, and gives notice of filing the following discovery documents in the above-styled cause and serving a copy of same upon all attorneys of record.

- ☐ First Interrogatories to Plaintiff.
- ☐ Request for Production of Documents.
- ☐ Request for Admissions.
- ☒ Notice of Taking Video Deposition of Mr. Ken Buckley on September 20, 2006.
- ☐ Response to Request for Production.
- ☐ Answers to Interrogatories.
- ☐ Response to Request for Admissions.
- ☐ Other:

/s/ David A. Lee

David A. Lee (LEE019)  
ASB-3165-E47D  
Attorney for Defendants

OF COUNSEL:

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/s/ David A. Lee  
OF COUNSEL